

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-CV-203-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.,)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC., AND MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
)	
Defendants.)	

**DECLARATION OF YANAN ZHAO IN SUPPORT OF NETLIST, INC.'S
OPPOSITION TO DEFENDANTS' MOTION TO COMPEL RESPONSES
TO INTERROGATORY NOS. 15, 16, AND 31 (DKT. 189)**

I, Yanan Zhao, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and the State Bar of Texas and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposition to Defendants’ Motion to Compel Responses to Interrogatory Nos. 15, 16, and 31 (Dkt. 189). Unless otherwise indicated, I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Plaintiff Netlist, Inc.’s First Supplemental Infringement Contentions dated January 27, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of Defendant Micron’s Second Set of Interrogatories to Netlist, dated August 3rd, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of a web page from JEDEC.org entitled “Standards & Document Search” that was accessed on October 3, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the JEDEC Manual of Organization and Procedure (Revision JM21U), dated December 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on October 5, 2023, in Los Angeles, California.

By /s/ Yanan Zhao
Yanan Zhao